

Exhibit 2

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**DEFENDANT'S NOTICE OF 30(b)(6)
DEPOSITION OF PLAINTIFF FAIR
ISAAC CORPORATION**

FEDERAL INSURANCE COMPANY,
an Indiana corporation,

Defendant.

TO: Fair Isaac Corporation, c/o Allen Hinderaker, Heather Kliebenstein, and Michael A. Erbele, Merchant & Gould P.C., 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402:

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Federal Insurance Company ("Federal") will take the deposition upon oral examination of Plaintiff Fair Isaac Corporation ("FICO") by its designated witness or witnesses regarding the topics identified in Attachment A attached hereto at 9:00 a.m. on September 12, 2018 at the offices of Fredrikson & Byron P.A., 200 South Sixth Street, Suite 4000, Minneapolis, Minnesota. The deposition will be taken before and transcribed by a notary public or other officer authorized to administer oaths and record testimony. The testimony will be recorded by stenographic means and may be recorded by videographic means.

Dated: July 27, 2018

s/ Christopher D. Pham

Terrence J. Fleming (#0128983)

tfleming@fredlaw.com

Lora M. Friedemann (#0259615)

lfriedemann@fredlaw.com

Leah Janus (#0337365)

ljanus@fredlaw.com

Christopher D. Pham (#0390165)

cpham@fredlaw.com

FREDRIKSON & BYRON, P.A.

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425

(612) 492-7000 (tel.)

(612) 492-7077 (fax)

Attorneys for Defendant

64161201.1

ATTACHMENT A

INSTRUCTIONS

1. You are required to appear at the taking of a deposition to testify responsive to the following topics. You are required to furnish such information as is available to you, including but not limited to, information known to your officers, employees, agents, or anyone acting for or on your behalf.

2. If you have no information about the subject of a particular category or if for some reason you are unable to answer it, the response should specifically so state.

3. If you assert a claim of privilege in objection to any topic or question, identify the nature and basis of the privilege claimed, and provide as much of the following information as is not encompassed by the privilege: type; general subject matter and purpose; date; the names of persons making or receiving the communication, and of those present when it was made; the relationship of the named person to the author or speaker; and any other information upon which you may rely to support your claim of privilege or the immunity from discovery.

30(B)(6) DEPOSITION TOPICS

1. Fair Isaac Corporation's ("FICO") understanding of the scope of the Blaze Advisor® software license agreement with Federal Insurance Company ("Federal").

2. Identification of all FICO employees, representatives, or agents that communicated (i.e., involved in any meetings, emails, or phone conferences) with any employees, representatives, or agents of Federal and/or Chubb & Son, a division of

Federal, both in the United States and/or internationally, regarding the licensing of the Blaze Advisor® software.

3. Identification of all FICO employees, representatives, or agents that communicated with (i.e., involved in any meetings, emails, or phone conferences) and/or assisted any employees, representatives, or agents of Chubb & Son, a division of Federal, both in the United States and/or internationally, regarding the use, installation, implementation, downloading of, or programming of the Blaze Advisor® software.

4. FICO's knowledge with respect to the use of Blaze Advisor® software by Federal and/or Chubb & Son, a division of Federal.

5. FICO's communications with Federal and/or Chubb & Son, a division of Federal regarding the use, installation, implementation, downloading of, or programming of the Blaze Advisor® software at Federal and/or Chubb & Son, a division of Federal.

6. FICO's participation with or assistance to Federal and/or Chubb & Son, a division of Federal regarding the use, installation, implementation, downloading of, or programming of the Blaze Advisor® software at Federal and/or Chubb & Son, a division of Federal.

7. Identification of all FICO employees, representatives, or agents involved in FICO's decision to terminate the license, and the grounds for the decision.

8. FICO's alleged damages in this action.

9. FICO's responses to Federal's document requests, and the efforts made to identify and collect responsive documents.

10. Identification of all FICO employees, representatives, or agents involved in the decision to provide a licensee with the right to continue using the Blaze Advisor® software when such use is believed to be the subject of an infringement or misappropriation claim.

11. Identification of all FICO employees, representatives, or agents involved in the decision to replace or modify the Blaze Advisor® software when use of the software is believed to be the subject of an infringement or misappropriation claim.

12. Identification of all FICO employees, representatives, or agents involved in the decision to terminate the Blaze Advisor® software license when use of the software is believed to be the subject of an infringement or misappropriation claim.

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2018, a copy of the foregoing was emailed to the following attorneys of record for Plaintiff Fair Isaac Corporation:

Allen Hinderaker, MN Bar # 45787
Heather Kliebenstein, MN Bar # 337419
Michael A. Erbele, MN Bar # 393635
MERCHANT & GOULD P.C.
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402-2215
Tel: (612) 332-5300
Fax: (612) 332-9081
ahinderaker@merchantgould.com
hkliebenstein@merchantgould.com
merbele@merchantgould.com

July 27, 2018

/s/ Brenda Haberman
Brenda Haberman